

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FRANSSEN CONDOMINIUM
ASSOCIATION OF APARTMENT
OWNERS, a Washington non-profit
corporation,

Plaintiff,

v.

COUNTRY MUTUAL INSURANCE
COMPANY, an Illinois company;
FARMINGTON CASUALTY COMPANY, a
Connecticut company; THE TRAVELERS
INDEMNITY COMPANY, a Connecticut
company; THE TRAVELERS INDEMNITY
COMPANY OF AMERICA, a Connecticut
company; and TRAVELERS CASUALTY
INSURANCE COMPANY OF AMERICA, a
Connecticut company,

Defendants.

No.: 2:21-cv-00295-BJR

STIPULATED MOTION CONTINUING
PRETRIAL DEADLINES

STIPULATION

Due to complications arising from the COVID-19 Pandemic, Plaintiff Franssen
Condominium Association of Apartment Owners and Defendants Country Mutual Insurance
Company, Farmington Casualty Company, The Travelers Indemnity Company, The
Travelers Indemnity Company of America, and Travelers Casualty Insurance Company of
America (collectively, the “Parties”) respectfully request a short extension of certain case

deadlines in this lawsuit. The requested extensions should not impact the trial date.

Plaintiff retained Jens Johanson and/or Jim Kessler of J2 Building Consultants as an expert regarding damage, causation, and repairs. Plaintiff recently advised Defendants that both Mr. Johanson and Mr. Kessler are recovering from COVID-19 and, thus, need additional time to comply with the current expert disclosure deadline. As a result, the Parties do not anticipate being able to meet the current discovery deadlines set by the Order Setting Trial Dates and Related Dates (Dkt. 24). To ensure adequate time and opportunity for the Parties to conduct sufficient discovery without endangering the health of themselves, their employees, attorneys, and the public at large, the Parties jointly request a short continuance of certain pretrial deadlines.

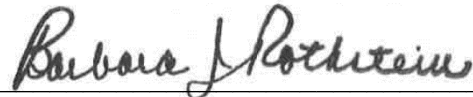
Due to the above facts, the Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of certain pretrial deadlines. The Parties do not believe that their requested changes to pretrial deadlines will require rescheduling the trial.

Consequently, the Parties, through their counsel, stipulate to the following proposed extensions of the deadlines in the Court's Order Setting Trial Dates and Related Deadlines (Dkt. 24):

Event	Original Deadline	New Deadline
Reports from expert witnesses under FRCP 26(a)(2) due	November 22, 2021	December 6, 2021
Rebuttal expert disclosures	None	January 5, 2022
Expert deposition cutoff	None	February 4, 2022
Dispositive motion cutoff	January 21, 2022	February 11, 2022
Discovery completed by	December 22, 2021	February 25, 2022
All motions <i>in limine</i> must be filed by	May 16, 2022	May 16, 2022
Joint Pretrial Statement	May 23, 2022	May 23, 2022

1	Pretrial conference	June 6, 2022	June 6, 2022
2	Jury Trial Date	June 20, 2022	June 20, 2022
3	Length of Jury Trial	7-10 days	7-10 days

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6 DATED this 29th day of November, 2021.

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9 BARBARA J. ROTHSTEIN
10 UNITED STATES DISTRICT JUDGE
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